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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA MARTINEZ;  
ISAAC ANTONIO LOPEZ CASTILLO; JOSUE  
VLADIMIR CORTEZ DIAZ; JOSUE MATEO  
LEMUS CAMPOS; MARVIN JOSUE GRANDE  
RODRIGUEZ; ALEXANDER ANTONIO  
BURGOS MEJIA; LUIS PEÑA GARCIA;  
JULIO CESAR BARAHONA CORNEJO, as  
individuals,

**PLAINTIFFS,**

v.

THE GEO GROUP, Inc., a Florida  
corporation; the CITY OF ADELANTO, a  
municipal entity; GEO LIEUTENANT  
DIAZ, sued in her individual capacity;  
GEO SERGEANT CAMPOS, sued in his  
individual capacity; SARAH JONES, sued  
in her individual capacity; THE UNITED  
STATES OF AMERICA<sup>1</sup>; CORRECT CARE  
SOLUTIONS, INC.; and DOES 1-10,  
individuals;

**DEFENDANTS.**

Case No.: 5:18-cv-01125-R-GJS

**JOINT STIPULATION TO FILE  
SECOND AMENDED COMPLAINT**

*([Proposed] Order filed concurrently  
herewith)*

<sup>1</sup> The United States of America ("USA") remains in the caption as a Defendant solely to preserve Plaintiffs' rights on appeal. Plaintiffs' claims against the USA were dismissed by the Court on May 1, 2019 (*see* Dkt. 70).

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**TO THE ABOVE ENTITLED COURT:**

Plaintiffs Omar Arnoldo Rivera Martinez, Isaac Antonio Lopez Castillo, Josue Vladimir Cortez Diaz, Josue Mateo Lemus Campos, Marvin Josue Grande Rodriguez, Alexander Antonio Burgos Mejia, Luis Peña Garcia, and Julio Cesar Barahona Cornejo (“Plaintiffs”) and Defendants The GEO Group, Inc. (“GEO”), the City of Adelanto, GEO Lieutenant Duran, GEO Lieutenant Diaz, GEO Sergeant Campos (collectively, “GEO Defendants”), and Sarah Jones, LVN (collectively, GEO Defendants and Sarah Jones are hereinafter referred to as “Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, discovery has revealed that Correct Care Solutions contracted with Defendant GEO Group to provide medical care to the detainees at Adelanto Detention Center;

WHEREAS, discovery has revealed that Correct Care Solutions at all times relevant was Defendant Sarah Jones’s and DOE 6’s employer;

WHEREAS, Plaintiffs have agreed to dismiss Lieutenant Duran from the lawsuit, in exchange for Defendants waiving any associated costs, and the amended complaint eliminates her from any claims;

WHEREAS, for all the foregoing reasons, all parties consent to the filing of the Second Amended Complaint to conform the Complaint to the discovery taken in this case.

**IT IS SO STIPULATED.**

Dated: July 31, 2019

LEWIS BRISBOIS BISGAARD & SMITH

By: /s/ Judith M. Tishkoff

Judith M. Tishkoff  
Attorneys For Defendant,  
SARAH JONES.

1 Dated: July 31, 2019

BURKE, WILLIAMS & SORENSEN, LLP

2  
3 By: /s/ Susan E. Coleman

4 Susan E. Coleman<sup>2</sup>

5 Kristina D. Strottman

6 Carmen M. Aguado

7 *Attorneys for Defendants,*

8 *THE GEO GROUP, INC., CITY OF*

*ADELANTO, CAMPOS, DIAZ and*

*DURAN.*

9 Dated: July 31, 2019

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15  
16 BY: /s/ Catherine E. Sweetser

17 Catherine E. Sweetser

18 *Attorney for Plaintiffs.*

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27 <sup>2</sup> Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all signatories listed,  
28 and on whose behalf the filing is submitted, concurs in the filing's content and have authorized the filing.